

1 Steven J. Parsons  
2 Nevada Bar No. 363  
3 LAW OFFICES OF STEVEN J. PARSONS  
4 7201 W Lake Mead Blvd Ste 108  
5 Las Vegas NV 89128-8354  
6 (702) 384-9900  
7 (702) 384-5900 (fax)  
8 [steve@sjplawyer.com](mailto:steve@sjplawyer.com)

5  
6 Attorneys for Plaintiff  
7 ELAINE WITHROW

7 UNITED STATES DISTRICT COURT

8 DISTRICT OF NEVADA

9 ELAINE WITHROW, an individual;

Case No. 2:15-cv-01573-GMN-(GWF)

10 Plaintiff,

THE PARTIES' STIPULATION  
11 vs. ~~AND PROPOSED ORDER~~  
12 CAMDEN DEVELOPMENT, INC., a Delaware  
13 corporation; et al.,  
14 Defendants.  
15 \_\_\_\_\_ /  
16  
17

EXTENDING THE BRIEFING SCHEDULE, and  
CONTINUING THE OCTOBER 1, 2015  
MOTION TO TRANSFER VENUE  
(Docket No. 6)  
(Second Request)

15 The parties, by the undersigned counsel, at Plaintiff's request, hereby stipulate and  
16 agree to extend the briefing schedule and ask the Court to continue the hearing date on  
17 Defendants' Motion to Transfer Venue (Docket No. 6) as follows:

18 Plaintiff's Opposition to Defendants' Motion shall now be due on or before Thursday,  
19 October 1, 2015;

20 Defendants' Reply in support of their Motion shall be due on October 15, 2015, fourteen  
21 (14) days after the service of Plaintiff's filed Opposition.

22 Defendants' Motion has been set for hearing on Thursday, October 16, 2015 at 9:30  
23 a.m. (Docket No. 9). The parties hereby request that the Court reset the hearing on  
24 Defendants' Motion for the first available date for hearing after the Motion is fully briefed. The  
25 parties believe that the matter of Defendants' Motion to Transfer Venue will be fully briefed and  
26 ready for hearing not earlier than Monday, October 26, 2015.

27 This requested extension of the briefing schedule is made to accommodate Plaintiff's

1       counsel Joseph Mott, who will be the primary drafter of Plaintiff's brief, and is undergoing a  
2       medical procedure the week of September 21, 2015 and will be out of the office until the  
3       following week<sup>1</sup>. This stipulation is made in good faith and is not merely for delay.

4                   Dated: Thursday, October 1, 2015.

5       LAW OFFICES OF STEVEN J. PARSONS

JACKSON LEWIS P.C.

6       /s/ Steven J. Parsons  
7       STEVEN J. PARSONS  
7       Nevada Bar No. 363

/s/ Elayna J. Youchah  
ELAYNA J. YOUCRAH  
Nevada Bar No. 5837

8       Attorneys for Plaintiff  
9       ELAINE WITHROW

Attorney for Defendants  
CAMDEN DEVELOPMENT, INC.;  
CAMDEN PROPERTY TRUST;  
H. MALCOLM STEWART, in his capacity as  
trustee or fiduciary of the CAMDEN "KEYSOP"

11                   ORDER

12       IT IS HEREBY ORDERED that Plaintiff's Opposition to Defendants' Motion to Transfer  
13       Venue shall be due on or before Thursday, October 1, 2015.

14       IT IS FURTHER ORDERED that Defendants' Reply in Support of their Motion to Transfer  
15       Venue shall be due on or before October 15, 2015, which is fourteen (14) days after the filing  
16       of Plaintiff's Opposition to Defendants' Motion.

17       IT IS FURTHER ORDERED that the hearing on Defendants' Motion to Transfer Venue  
18       is continued from Thursday, October 16, 2015 at 9:30 a.m. to Wednesday, November 4,  
19       2015 at 9:30 a.m.

20       Dated: October 5, 2015.



GEORGE FOLEY, JR.  
United States Magistrate Judge

23

24

25

26

<sup>1</sup> The parties intended for this stipulation to be filed last week, but in the lead up to and outfall from Mr. Mott's medical procedure, the stipulation was not filed as planned.